

LAW OFFICE OF DAN M WINDER PC  
DAN M. WINDER, ESQ.  
Nevada Bar No. 001569  
ARNOLD WEINSTOCK, ESQ.  
Nevada Bar No. 00810  
SCOTT C. DORMAN, ESQ.  
Nevada Bar No. 13108  
MATTHEW J. PEIRCE, ESQ.  
Nevada Bar No. 006449  
3507 W. Charleston Blvd.  
Las Vegas, Nevada 89102  
Tele: (702) 878-6000  
Fax: (702) 474-0631  
E-Mail: winderdanatty@aol.com  
Attorney for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAZVAN MARCU,

Defendant.

Case No.: 2:14-cv-00159

**DEFENDANT'S UNOPPOSED EMERGENCY MOTION TO EXTEND TIME  
TO FILE  
RESPONSE TO PLAINTIFF'S MOTION'S FOR SUMMARY JUDGMENT #'s 57-61  
First Request for Extension of Time**

PLAINTIFF has filed an extensive 33 page Motion for Summary Judgment accompanied by hundreds of pages of exhibits which requires an extensive legal and factual response. Although the brief exceeds the page requirement of Local Rule 7-4 Plaintiff did not seek an Order to exceed the page limitation imposed by LR 7-4 or contain the Table of Contents and

1 table of Points and Authorities required by the rule. Although Counsel for Plaintiff has been  
2 diligently working on this response, Counsel does not believe a full and complete response can  
3 be completed by the deadline of 11/13 2015.

4  
5 Plaintiff's counsel indicated the Plaintiff will not oppose a motion requesting an  
6 extension until the 19<sup>th</sup> of November, 2015.

7 Accordingly, Plaintiff requests this court extend time for filing the response to the  
8 Motions for Summary Judgment filed by the Plaintiff until the 19<sup>th</sup> of November, 2015.

9  
10 DATED this 10<sup>th</sup> day of Nov., 2015.

11 LAW OFFICE OF DAN M. WINDER PC

12   
13 DAN M. WINDER, ESQ.

14 Nevada Bar No. 001569

15 ARNOLD WEINSTOCK, ESQ.

16 Nevada Bar No. 00810

17 SCOTT C. DORMAN, ESQ.

18 Nevada Bar No. 13108

19 MATTHEW J. PEIRCE, ESQ.

20 Nevada Bar No. 006449

21 3507 W. Charleston Blvd.

22 Las Vegas, Nevada 89102

23 Tele: (702) 878-6000

24 Fax: (702) 474-0631

25 E-Mail: winderdanatty@aol.com

26 Attorney for Defendant

27  
28 IT IS SO ORDERED:



RICHARD F. BOULWARE, II

United States District Judge

DATED this 16th day of November, 2015.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15<sup>th</sup> day of January, 2015, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing documents are being served this day on all parties as listed on the Notice of Electronic filing.

These documents are available for viewing and downloading from the ECF system.

Joyce R. Branda  
Acting Assistant Attorney General  
William C. Peachey  
Director  
Danielle K. Schuessler  
Trial Attorney  
Kirsten L. Daeubler  
Trial Attorney  
United States Department Of Justice  
Civil Division  
Office Of Immigration Litigation  
District Court Section  
P.O. Box 868, Ben Franklin Station  
Washington, Dc 20044  
Tele.: (202) 305-9698 (D. Schuessler)  
Tele.: (202) 616-4458 (K. Daeubler)  
Fax: (202) 305-7000  
Email: danielle.k.schuessler@usdoj.gov  
kirsten.daeubler@usdoj.gov  
Attorneys for the United States

Daniel G. Bogden  
United States Attorney  
District Of Nevada  
Roger W. Wenthe  
Assistant United States Attorney  
Nevada Bar No. 008920  
United States Attorney's Office  
333 Las Vegas Boulevard South, Suite 5000  
Las Vegas, Nevada 89101  
Tele.: 702-388-6336  
Fax: 702-388-6787  
Email: roger.wenthe(@usdoj.gov  
Attorneys for the United States

/s/ Hamilton D Moore  
Service minion for the Law Office of Dan M. Winder PC